

# Code of Ethics



# A message from the Chief Executive Officer

**Working ethically and with integrity is a key concern for our Group.**

At Verallia, we believe that respect for our values drives our business model and our stakeholders' trust in us.

We undertake to promote sustainable, profitable growth that is respectful of the environment and our employees, partners, customers, suppliers, shareholders and investors.

To that end, we ask you to embody our ethical principles on a daily basis and thus make Verallia an exemplary company.

This Code of Ethics aims to guide us on this path. It sets out our commitments and the behaviour we expect from our employees.

The rules it lays down apply to all of us, irrespective of our positions, across all levels of the company. As such, it is vital that each of us knows, understands and applies this guide.

We are all accountable when it comes to ethics. When in doubt, ask for advice: reach out to your colleagues, line manager or the CSR and Legal Department.

Working together, we strive to uphold a culture of ethics within Verallia, and we rely on you to help us carry out our business in an exemplary manner.

**Patrice Lucas,  
Chief Executive Officer**



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# We are Verallia

**Proud of what we do and passionate about glass, we are committed to securing the company’s future by facing up to our responsibilities to address social and climate challenges.**

Since our beginnings at the Vauxrot glass plant in northern France more than 200 years ago, we have been applying our passion and know-how to the glass industry. Today we are the European leader and the world’s third-largest producer of glass packaging for beverages and food products, with 34 glass production plants across 12 countries.

The 10,000 women and men working for us are all passionate about what they do. They take every possible measure to ensure that our customers worldwide can enjoy beverages and food products in packaging that is healthy, attractive and sustainable. That is our mission. It is what drives us to proudly offer innovative, customised and environmentally friendly solutions.

**We rely on four strong values to guide our actions:**



**Care for customers**



**Respect for people, laws, and the environment**



**Empowerment and accountability**



**Teamwork**

In a continuously changing world, Verallia must be rooted in a broader social context that takes both people and environmental concerns into consideration. Being an industry leader comes with responsibilities. We must be a driving force in the sector’s transformation.



**Our corporate purpose:  
Reimagine glass for a sustainable future.**

That is our DNA; it gives meaning to the action we take. We want to redefine how glass is produced, reused and recycled. Our ambition is to make glass the most sustainable packaging material in the world and to make the glass circular economy a reality.

This purpose requires us to be open to new ideas and methods in terms of manufacturing, reuse and recycling.



**To support our long-term vision and strive for excellence together, our strategy is underpinned by four lines of action:**

1. Pursue disciplined growth
2. Increase operational excellence
3. Invest wisely for a sustainable future
4. Anchor a strong and inclusive entrepreneurial culture



# Legal compliance

Verallia complies with the laws and regulations in force. Our values are inspired by:

- the Universal Declaration of Human Rights;
- the principles of the International Labour Organization.

We adhere to the United Nations Global Compact and follow:

- the OECD Guidelines for Multinational Enterprises;
- the United Nations Guiding Principles on Business and Human Rights;
- the International Human Rights Charter;
- the regulations of all countries in which we operate, in particular regarding:
  - the fight against corruption,
  - competition law,
  - respect for the environment,
  - work organisation.

No Verallia employee may breach or cause anyone to breach a law or regulation on behalf of the Company.



**Some of the countries in which we operate may have stricter principles, practices or laws than those set out in this Code of Ethics. Regardless of the situation, you must comply with the most stringent rule.**

# To whom does this Code apply?

This Code of Ethics applies to everyone who works at the Verallia Group, regardless of their position or their management level.

As employees, we must:

- know and observe the principles and rules set out in this Code and in any related policies, procedures and charters;
- whistleblow if we become aware of a violation of ethical principles.

As managers, we must:

- behave in an exemplary manner;
- raise our teams' awareness of the importance of ethics within Verallia;
- answer our employees' questions and guide their ethical behaviour on a daily basis;
- report any alerts received..

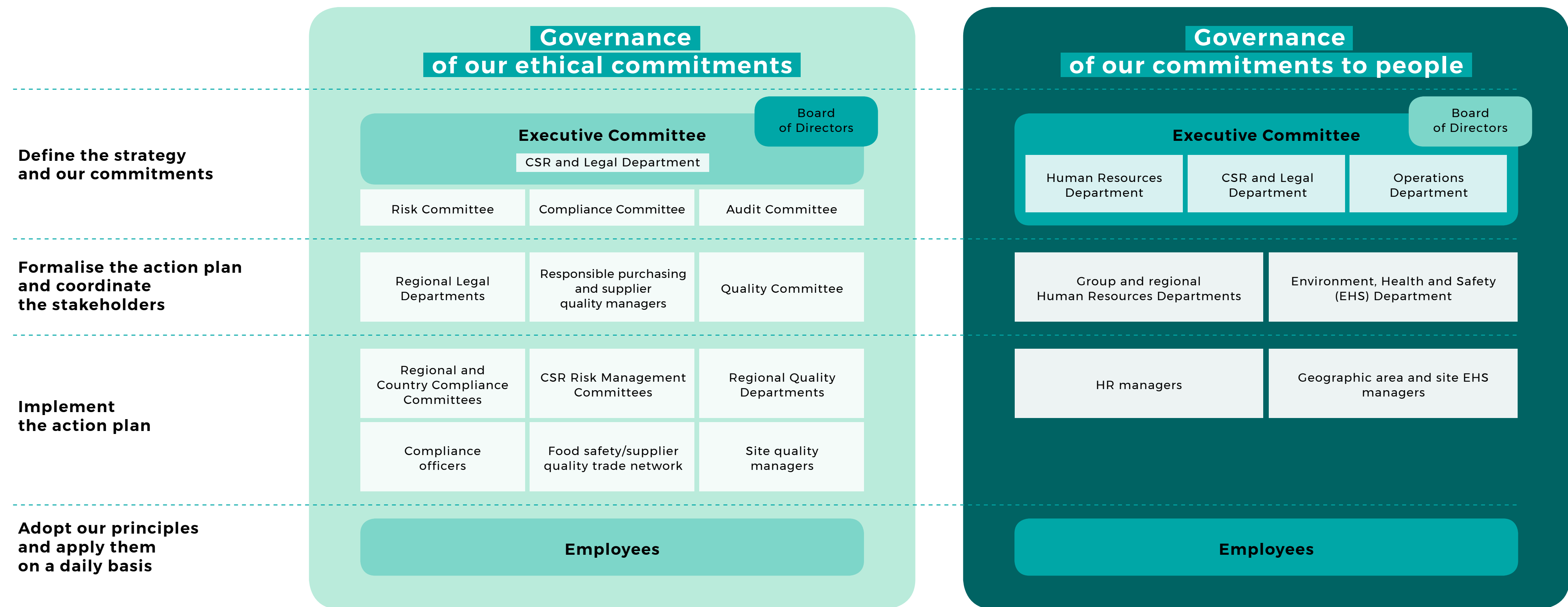
As senior executives, we must outline and uphold the Group's approach to ethics, along with its values.



**The principles set out in this Code also apply to our stakeholders, including suppliers, sub-contractors, sales representatives, and other intermediaries and service providers via their relevant policies.**



# Ethics & compliance governance



CHAPTER 1

# Verallia, a committed corporate player



Verallia, a committed corporate player

# Reducing our CO<sub>2</sub> emissions

We want to be a driving force in the packaging sector's transformation.

At Verallia, we are convinced that current models require urgent change to protect the planet's limited natural resources.

To that end, we are accelerating innovation across our entire value chain. We are investing in research and development for a more environmentally friendly industry.

We expect all our employees to respect and uphold our environmental commitments on a daily basis.

These commitments includes:

- increasing the proportion of low-carbon raw materials;
- incorporating energy performance criteria into our supplier selection process;
- optimising the energy consumption of our industrial tools;
- investing in low-carbon furnaces;
- increasing the use of renewable or low-carbon energies.

→ We reduce our environmental footprint by prioritising the reduction of CO<sub>2</sub> emissions.



### Further reading

- Verallia's corporate purpose
- Statement of Non-Financial Performance
- Environmental commitments
- CSR report



### Contacts

- CSR and Legal Department
- Operations Department
- Communications Department

→ When in doubt

## Case studies

I have an idea to reduce energy consumption from glass melting activities.

Who should I talk to?

That sounds interesting! You can talk to the R&D Department or to Industrial Management.

When visiting a supplier, I realise that they were untruthful about their greenhouse gas emissions and actually pollute much more. What should I do?

Our suppliers were selected based on their integrity and environmental performance in particular. If one of them provides false information, you must report this immediately to the Purchasing Department or to the CSR and Legal Department.

### Practices to implement

- ✓ Reduce our energy consumption by improving our industrial processes and tools.
- ✓ Use the resources at our disposal as effectively as possible, across all stages of production.
- ✓ Adopt environmentally friendly behaviour every day.

### Practices to avoid

- ✗ Using more resources than necessary in conducting our business.





# Promoting the circular economy

Optimising our resource management is a strategic line of action for our development.

The circular economy is an economic model that targets sustainable production while limiting the consumption and waste of resources, as well as waste production.

As a player in the circular economy, we focus on reducing our environmental impact, especially by using more external cullet.

Glass is a fully and infinitely recyclable material. It lies at the heart of the circular economy.

→ **As an industry leader, we put the circular economy at the heart of our business. We have worked it into all stages of our production cycle.**



### Further reading

- Verallia's corporate purpose
- Statement of Non-Financial Performance
- Environmental commitments
- CSR report



### Contacts

- CSR and Legal Department
- Operations Department
- Communications Department
- Purchasing Department

→ **When in doubt**

### Practices to implement

- ✓ **Make our customers and end users more aware of the importance of glass recycling.**
- ✓ **Encourage and facilitate the reuse of glass packaging.**
- ✓ **Share best practices.**

### Case study

**A friend who works for the Local Authority wants to promote glass collection and recycling. Can I help them, on behalf of Verallia?**

Yes, we believe it is important to alert end users to glass collection and recycling. Speak to your local CSR managers about it.



Verallia, a committed corporate player

# Managing water and waste responsibly

Preserving water resources and managing waste are important concerns for Verallia.

Although water use is optimised and reduced, it remains essential to the glass-making process, mainly as a coolant.

Our three-pronged policy allows us to preserve water resources:

- reduce consumption;
- avoid pollution caused by spills;
- implement closed recycling loops across all plants.

Glass production plants generate little waste, since 100% of the raw materials are transformed into glass. If there are any defects, the glass is recycled.

Nevertheless, we implement several measures to:

- limit our waste production;
- ensure better waste treatment;
- return waste to the internal circuit;
- improve the recycling and recovery rates.

**→ We are striving to use less water and produce less waste.**



## Further reading

- Verallia's corporate purpose
- Statement of Non-Financial Performance
- Environmental commitments
- EHS policy
- CSR report



## Contacts

- CSR and Legal Department
- Operations Department
- Communications Department
- Purchasing Department

**→ When in doubt**

## Practices to implement

- ✓ Use the minimum amount of water in production processes.
- ✓ Observe the 17 golden rules of our «Water Standard» to preserve water resources.
- ✓ Sort our waste and promote recycling as soon as possible.

## Practices to avoid

- ✗ Wastewater discharge.
- ✗ Waste disposal outside of the designated areas.

## Case study

**I realise that a leak in the plant's water treatment system causes wastewater to be discharged directly into the soil surrounding the plant.**

**What should I do?**

You must inform your line manager or local EHS manager so that the issue is addressed as soon as possible.



Verallia, a committed corporate player

# Having a positive impact on communities

Wherever we are, we work alongside local communities to have a positive impact.

Verallia looks back on a long tradition of commitment across all its sites worldwide.

Not only do our sites make an economic contribution to the local fabric, but they are also actively involved in various initiatives that have a positive impact on the communities. Our employees are generally behind these initiatives.

Examples of such initiatives include:

- raising public awareness of the properties of glass and its recycling;
- donations to voluntary and charitable associations;
- solidarity campaigns;
- plant visits;
- campaigns to pass on the love for glass to young generations;
- greening of production sites;
- etc.

→ **Our commitment to communities is entrenched in our values through a special focus on people, laws and the environment.**



### Further reading

- Statement of Non-Financial
- Performance CSR report
- Nature On Site programme



### Contacts

- Human Resources Department
- CSR and Legal Department

→ **When in doubt**

### Practices to implement

- ✓ Have a positive impact on local communities wherever we are.
- ✓ Ensure we become part of the local environment.
- ✓ Establish a dialogue with these communities and listen to their needs.
- ✓ Provide documents translated into the local languages.

### Practices to avoid

- ✗ Denigrating a local culture.
- ✗ Violating a local law or regulation, especially regarding labour law, company law and taxation.

### Case study

**A worker at our Campo Bom plant in Brazil knows someone who is setting up an association to raise public awareness on recycling. Can I direct the team responsible for donations and patronage to this association?**

We are developing donation and patronage initiatives worldwide to support local communities, in line with our values and our corporate purpose. Talk to the Human Resources and CSR and Legal Department about this association.



Verallia, a committed corporate player

# Complying with international sanctions

We take care not to breach any international sanctions in force.

As an international player, Verallia works with partners around the world. We take special care to ensure compliance with international trade rules, such as economic sanctions and embargoes.

Non-compliance with these rules may damage our reputation. Furthermore, it may have serious criminal and financial repercussions for the companies and individuals involved, and for the entire Group.

Before importing or exporting any goods or services, we must ensure that the transaction does not violate any applicable international sanctions.

To that end, we:

- ensure that our employees are properly trained;
- assess our third parties operating in countries subject to international sanctions.

→ We comply with all regulations regarding export control and international trade restrictions in the countries where we operate.



### Further reading

- Group Economic Sanctions Policy



### Contacts

- CSR and Legal Department
- Compliance officers

→ When in doubt

### Practices to implement

- ✓ Obtain reliable information on our customers and suppliers who may have operations in a country subject to international sanctions.
- ✓ Perform thorough due diligence before making a transaction.
- ✓ Identify the politically exposed persons among our commercial partners.
- ✓ Contact the CSR and Legal Department when in doubt.

### Practices to avoid

- ✗ Violating international sanctions or any rule on importing and exporting goods and services.
- ✗ Making a transaction in a country subject to economic sanctions.

### Case study

One of our long-standing suppliers has transferred their bank details to an account located in a country subject to international sanctions. How should I react?

Although you already know this supplier, such a change deserves your attention. Contact the CSR and Legal Department for a thorough review.



# Combating money laundering and tax evasion

## We do not tolerate any form of tax law violations.

Money laundering is the process of reinvesting illegally acquired funds into legal activities by disguising the source of funds.

We have no financial arrangements in place that are intended to obtain a tax benefit contrary to the applicable tax law.

Tax evasion involves hiding funds from the tax authorities to avoid paying the associated taxes.

Verallia has no legal entity in the countries included on the European Union's blacklist of tax havens.

We are careful not to participate in suspicious activities in the course of our collaboration with commercial partners.



**We undertake to comply with the applicable tax law wherever we operate and to combat money laundering.**

### Contacts

- CSR and Legal Department
- Tax Department

 **When in doubt**

### Practices to implement

- ✓ Pay the taxes and duties owed under local laws.
- ✓ Be transparent and thorough when filing tax returns.
- ✓ Comply with Verallia's responsibilities as a listed French company.
- ✓ Check the integrity of our commercial partners by verifying their real existence and their beneficial owners.
- ✓ Cooperate fully with the tax authorities and auditors, whether internal or external.

### Practices to avoid

- ✗ Tolerating or overlooking a facilitation arrangement, tax evasion or money laundering.
- ✗ Accepting a cash transaction.
- ✗ Making a payment to a bank account that does not belong to the same legal entity as the one with which the contract was signed (unless this was agreed to in the contract) or that is located in a tax haven.

### Case study

**Our service provider Fourotop sends us an invoice in the name of the company Calcifer. They say it is their parent company, but we haven't heard of it. Should I make the payment?**

No. This suspicious situation could indicate an attempt at tax evasion or money laundering. You should first contact the CSR and Legal Department, who will review the situation to establish the integrity of Calcifer.

CHAPTER 2

# Verallia, a committed economic player



# Ensuring our product quality

We strive for excellence in our products and ensure they are fully compliant with food safety rules.

Innovation and customer satisfaction are two of our main concerns.

As such, we focus on ensuring the quality of our products, complying with regulatory standards, and minimising the environmental impact of our activities.

By striving for excellence in our products, we address two major challenges:

- growing demands from our customers;
- stringent food safety regulations.

Our Supplier Quality Assurance process allows us to ensure the quality of our raw materials, in particular cullet and glass sand.

We also oversee the manufacture and quality control of our products by way of comprehensive, robust procedures. They are fully incorporated into our Group quality improvement plan.

On this basis, we develop a suitable local quality policy for each site.

→ **Providing our customers with quality, innovative products is one of our main concerns.**



### Further reading

- Statement of Non-Financial Performance



### Contacts

- Quality Department
- R&D Department
- CSR and Legal Department

→ **When in doubt**

### Practices to implement

- ✓ Control quality throughout the production process by applying our operational standards on a daily basis.
- ✓ Share and adapt our product quality and safety control plans.
- ✓ Comply with our hygiene rules to ensure food safety.

### Practices to avoid

- ✗ Violating food safety regulations.

### Case study

**As an employee, I am proud to contribute to our product quality. How can I be a part of our quality process?**

We all play a role in upholding Verallia's culture of quality. You are welcome to participate in the annual Food Safety and Quality Days. You can also complete our e-learning on food safety.



# Fighting corruption

**We have a zero-tolerance approach to corruption in all its forms.**

Corruption, also known as bribery, involves offering or accepting an undue advantage (money, gift, invitation, favour) in exchange for a favourable decision or act. Influence peddling involves offering or accepting an undue advantage in exchange for the use of someone's real or supposed influence.

A facilitating payment involves offering an undue advantage to a public official to accelerate or facilitate an administrative procedure.

The rejection of all forms of corruption is a principle that underlies our actions.

In support of this commitment, Verallia has joined the United Nations Global Compact and actively supports all anti-corruption initiatives.

We undertake to develop and maintain internal controls, policies and procedures to prevent and detect corruption and influence peddling.



**We reject all forms of corruption and together carry out our activities with integrity, in a lawful and transparent manner.**



## Further reading

- Anti-corruption and influence peddling policy
- Gifts policy
- Policy on sales representatives and other intermediaries and service providers
- Sponsorship and patronage policy



## Contacts

- CSR and Legal Department
- Compliance officers



**When in doubt**

## Practices to implement

- ✓ Know and apply the rules of our anti-corruption procedures.
- ✓ Check the integrity of our commercial partners.
- ✓ Build our relationships within a contractual framework.
- ✓ Explain the reasons for choosing a service provider, supplier, subcontractor or intermediary.
- ✓ Report the gifts and invitations that we receive or offer in the dedicated tool and obtain approval from the persons authorised.

## Practices to avoid

- ✗ Giving or receiving a gift, money or other advantage in exchange for a favourable act.
- ✗ Making donations to political parties or individual persons.
- ✗ Overlooking attempted corruption by one of our partners.

## Case studies

**The spouse of one of my contacts, a Brazilian wine producer, is campaigning for the city council. My contact is implying that a donation made to the relevant political party would allow me to win this contract. What should I do?**

Agreeing to this request would make you guilty of corruption. You must refuse and report the incident.

**I am negotiating a contract with a new sales representative. He has invited me to a Michelin-star restaurant. May I accept?**

You may not accept this invitation, as it could constitute attempted corruption. Moreover, it exceeds the value thresholds set out in Verallia's gift and invitations policy. You must report this invitation.





Verallia, a committed economic player

# Regulating...

## ...gifts and invitations

Handing out gifts and showing hospitality is common practice in working life. It is not prohibited.

However, we must be careful never to give or receive gifts or invitations intended to influence a decision or to obtain an undue advantage.



**Gifts or invitations granted or received to obtain an undue advantage constitute a form of corruption.**

**This practice is prohibited at Verallia.**

**We may accept or grant gifts and invitations if they:**

- have symbolic value and limited frequency;
- are granted outside of periods of calls for tender or commercial negotiations;
- are authorised by local law;
- are reported in the dedicated software if they exceed the threshold set for the geographic area in question (e.g. €100 in Europe and in the USA).

## ...donations and patronage

At Verallia, we support local initiatives through patronage operations and charity donations. That is how we strengthen our contribution to the economic and societal development of communities.



**Donations and patronage actions must always be carried out in good faith and without expecting an excessive, unjustified consideration or undue advantage in return.**

## ...sponsorship and lobbying

Verallia engages in lobbying with trade associations. The latter aims in particular to improve glass collection systems in Europe and to expand existing best practices.

We also perform local sponsorship actions to promote the company.



**These actions are always carried out in compliance with local laws.**

We pay particularly close attention to the way we lobby. We prohibit practices that may amount to corruption or influence peddling.



### Contacts

- CSR and Legal department
- Compliance officers
- Communication Department



### Further reading

- Donations and sponsorship policy
- Gifts and invitations policy



**When in doubt**



# Preventing conflicts of interest

We take care to always act in the interest of Verallia and to report any confirmed or potential conflict of interest.

A conflict of interest must be reported when our direct or indirect personal interests (related to our finances, friends and loved ones, etc.) come or seem to come into conflict with the Group's interests.

A conflict of interest is not a reprehensible situation per se. However, this situation presents a likelihood of failing to act in the best interests of Verallia.

Regardless of our seniority, each of us must reject or avoid any compromise between our personal interests and those of the Group we are working for.

We must report to the CSR and Legal Department any changes in our personal situation that may result in a conflict of interest with our duties at Verallia.



**We must avoid any compromise between our personal interests and those of the Group.**



## Further reading

- Group Conflict of Interest Policy



## Contacts

- CSR and Legal Department
- Compliance officers
- Human Resources Department



**When in doubt**

## Practices to implement

- ✓ Report any confirmed or potential conflict of interest upon being hired.
- ✓ Flag a new conflict of interest by writing to the CSR and Legal Department.
- ✓ Rely solely on objective criteria, such as qualifications, experience and skills, when hiring employees.

## Practices to avoid

- ✗ Using Verallia's resources for personal reasons.
- ✗ Interfering in the recruitment of a friend or family member.
- ✗ Contributing to discussions or to decision-making in situations where we have a personal interest.
- ✗ Investing in a company with which Verallia has or plans to have a business relationship.

## Case studies

**My nephew is seeking employment. He is the perfect fit for a position that has opened up in my team. May I recruit him?**

You can send his CV to your HR manager. However, you may not interfere in the recruitment process, and you must report the situation to the CSR and Legal Department.

**My wife recently invested in a company that may soon become a Verallia supplier. What should I do?**

Notify the CSR and Legal Department, which will take you through the process. You may need to withdraw from the negotiations under way with this company.



# Observing the rules of fair competition

Compliance with competition law is one of our fundamental principles.

Fair and healthy competition guarantees a well-functioning market and promotes long-term innovation. Compliance with competition law has always been a guiding principle underlying our actions.

We carry a special responsibility towards Verallia and the community to prevent any breaches of competition law.

In order to protect our activities, reputation and financial position, and thus the longevity of our company, we all (employees and senior executives alike) comply with competition rules.

We have as little interaction as possible with our competitors, and we take these rules into consideration when making commercial decisions.

→ **We undertake to stand up for fair and healthy competition on the market and to refrain from making agreements or arrangements contrary to competition rules.**



## Further reading

- Practical guide: complying with the rules of competition law



## Contacts

- CSR and Legal Department
- Compliance officers

→ **When in doubt**

## Practices to implement

- ✓ Have as little contact as possible with our competitors.
- ✓ Contact the CSR and Legal Department in the event of solicitation by a competitor.
- ✓ Respect the independence and autonomy of our suppliers and our customers.
- ✓ Immediately leave meetings or discussions that could breach competition law.
- ✓ Comply with competition law in informal situations, too.

## Practices to avoid

- ✗ Discussing a sensitive topic (price, commercial strategy, tender responses, production capacity) with a competitor.
- ✗ Implementing practices that prevent new competitors from accessing our market.

## Case studies

**As we are responding to a call for tenders, one of my contacts working for our main competitor suggests meeting up to agree on the volumes offered. What should I do?**

Attending this meeting would violate competition law. You must contact the CSR and Legal Department to prepare a written response rejecting their invitation.

**One of our distributors has increased their resale prices, despite our recommendations to the contrary. Can I ask them to follow our recommendations, otherwise we will stop supplying them?**

No, that would amount to imposing resale prices, which constitutes a breach of fair competition rules. We must provide an objective reason for refusing to supply a customer.



Verallia, a committed economic player

# Demonstrating transparency

We strive to be transparent in our financial and non-financial reporting.

Ensuring reliable and transparent financial communication is key to maintaining the trust of our investors and partners.

We record all our financial transactions in a rigorous, thorough manner.

We undertake to provide a truthful reflection of our commercial and financial transactions in our accounting documents.

We don't make any payments without clearly established and documented reasons.

All the assets, liabilities, expenses and other transactions concerning our companies are recorded in our books and accounts, and are managed with integrity and accuracy in accordance with the applicable laws.

Our archiving procedures are clearly defined and followed.

**→ We undertake to provide accurate and reliable financial and non-financial information in accordance with our regulatory obligations.**

## Contacts

- CSR and Legal Department
- Finance Department

**→ When in doubt**

## Practices to implement

- ✓ Keep our accounting systems up to date.
- ✓ Collect and record detailed information on payments made and received.
- ✓ Ensure that our invoices and expense reports provide all the information required for our account keeping.
- ✓ Check that financial and commercial documents are always accurate.

## Practices to avoid

- ✗ Reporting illegal or unauthorised payments as expenses.
- ✗ Overlooking suspicious, fraudulent or inaccurate payments or entries.

## Case study

**While reviewing the budget my line manager sent to the financial team, I notice a mistake in our operating expenses.**

**What should I do?**

Overlooking this error could lead to inaccurate financial reports and challenge the reliability of our reporting.

You must report this error to the Finance Department as soon as possible.



# Respecting the rights of shareholders

We respect the rights of our shareholders, as well as the relevant standards and regulations.

Verallia aims to safeguard the rights of its shareholders, as set out in law and enacted by the Afep-Medef Code to which we refer.

As a listed company, we must prevent insider trading. Insider trading occurs when someone purchases or sells our securities based on confidential information that is likely to affect our stock price.

Only a limited number of employees are authorised to disclose information to the financial markets. We comply with the applicable accounting, financial and stock market regulations.

We strive to ensure that our shareholders and investors receive relevant, transparent, balanced and educational information on our strategy, business model and non-financial challenges.

→ We strive to provide our shareholders and investors with truthful, quality information.



### Further reading

- Rules of Procedure of the Board of Directors
- Stock Market Ethics Charter



### Contacts

- CSR and Legal Department
- Finance Department

→ When in doubt

### Practices to implement

- ✓ Keep all information confidential until its disclosure.
- ✓ Inform the CSR and Legal Department of any confidential information about Verallia that may constitute inside information that we may know about.
- ✓ Ask the CSR and Legal Department if we are allowed to buy or sell Verallia securities when in doubt.

### Practices to avoid

- ✗ Buying or selling Verallia securities in your own name, or advising a third party to do so, during blackout periods (if applicable) or when we have inside information.

### Case study

I just found out that Verallia is going to acquire a competitor. The value of our share will probably increase once the information has been released. May I advise my brother to buy Verallia shares?

No, you currently have inside information.

You may not use it for personal gain or for the benefit of friends and family. You should exercise the utmost discretion until this information is published outside of the Group.

CHAPTER 3

# Verallia, a committed social player



# Protecting employee health and safety

We undertake to ensure all our employees enjoy a safe and healthy work environment.

Worker health and safety is a priority for the Group.

Safety must be a constant concern for each of us in order to protect ourselves and our colleagues. It is the responsibility of all our employees working on-site: Group employees, temporary workers and sub-contractors.

To guarantee the safety of all individuals, we follow four cardinal rules:

- do not neutralise or disable safety devices;
- always wear appropriate personal protective equipment;
- apply the Lock out, Tag out (LoTo) procedure for any intervention;
- do not misuse equipment or tools.



**We never compromise when it comes to safety.**

**We aim for zero accidents and we remain vigilant to ensure everyone's safety.**



## Further reading

- EHS policy
- Statement of Non-Financial Performance



## Contacts

- Operations Department
- Human Resources Department
- Group EHS Department



**When in doubt**

## Practices to implement

- ✓ Follow all safety standards.
- ✓ Ensure employees are aware of equipment operating risks.
- ✓ Identify risks and hazards at every site.
- ✓ Report all questions on safety and suggest improvements.

## Practices to avoid

- ✗ Overlooking risky behaviour by our sub-contractors.

## Case studies

I notice that a colleague is about to work on a section of an IS machine that is still moving. What should I do?

You must stop your colleague. IS machines can be dangerous and you must always work on a section that is idle. Remind your colleague of the nine safety rules for using this machine.

A temporary worker is working near the furnaces without wearing thermal protection equipment. He says he will only receive the gear tomorrow. What should I do?

You must never compromise on safety. If this temporary worker is not properly equipped, he should not be working near the furnaces. Explain the risks to him and move him away from the risk area.



# Ensuring an inclusive work environment

**We strive to encourage all our employees to unlock their full potential.**

Diversity and an inclusive environment improve our employees' commitment, performance and capacity for innovation.

We seek to ensure the fair representation of communities in our entities. We make every effort to provide everyone with the same access to the tools they need to grow, develop their skills and unlock their full potential.

We are committed to recruiting and training our employees without any discrimination. All employees must always base their decisions on this principle.

We fight against discriminatory practices. We protect employees having denounced discriminatory practices from any retaliation.

**→ We offer the same opportunities to all individuals and foster an inclusive, diverse and enabling workplace for all.**



**Contact**

• Human Resources Department

**→ When in doubt**

## Practices to implement

- ✓ Rely solely on objective criteria, such as qualifications, experience and skills, when hiring employees.
- ✓ Treat everyone in the company fairly.
- ✓ Behave in an inclusive manner.
- ✓ Adapt the work environment and certain spaces to allow access for workers with disabilities.

## Practices to avoid

- ✗ Making discriminatory comments or behaving in a discriminatory, prejudiced manner.

## Case studies

**One of my colleagues often faces derogatory comments about her disability. What to do?**

Verallia follows a policy of inclusion, especially where employees with disabilities are concerned. As such, you should not overlook this situation. Discuss it with the Human Resources Department.

**Having already made discriminatory comments about my ethnicity, my line manager has now turned me down for a position I was most qualified for. What can I do?**

Report the situation to the Human Resources Department without delay. If your line manager assessed your application based on your ethnicity, he or she will be sanctioned.





# Respecting human rights

**We promote and respect human rights and fair working practices wherever we operate.**

Verallia complies with international laws and conventions pertaining to human rights and labour rights.

Our employees and partners receive fair pay to ensure they enjoy a decent standard of living. We offer the applicable employee benefits.

Specifically, we abide by the principles enacted by the International Labour Organization, the International Declaration of Human Rights, and the United Nations Global Compact.

We refuse abusive labour practices, such as forced or child labour.

**→ We combat forced labour practices, child labour, and any form of discrimination with respect to our activities and those of our partners.**



### Further reading

- Supplier Charter
- Responsible purchasing policy
- Statement of Non-Financial Performance



### Contacts

- CSR and Legal Department
- Purchasing Department
- Human Resources Department

**→ When in doubt**

### Practices to implement

- ✓ Raise stakeholder awareness of our commitments to human rights.
- ✓ Ensure human rights are respected within my scope of responsibility.
- ✓ Ensure our business partners follow the same standards as we do.

### Practices to avoid

- ✗ All forms of forced labour.
- ✗ Offering work to people under the legal working age.

## Case studies

**When visiting one of our production plants, I notice the workers seem very young. What should I do?**

We do not tolerate child labour. Report the situation to the CSR and Legal Department or to the Purchasing Department without delay. They will investigate it further.

**A story on the evening news shows one of our suppliers, who is accused of using forced labour. How should I react?**

Verallia complies with all labour laws. We ensure that our suppliers and subcontractors do the same.

We conduct regular audits of our production sites and those of our sub-contractors to check that they comply with our human rights commitments. If they do not, we terminate the relationship. This should be reported to the Purchasing Team.



# Ensuring responsible purchasing

Verallia asks all its partners to join us in committing to our CSR approach.

The Group currently relies on nearly 10,000 active suppliers and implements a responsible purchasing programme focused on our environmental, legal and social requirements.

Our suppliers must sign the Supplier Charter. In doing so, they undertake to uphold our values and contribute to our CSR strategy by promoting innovation.

We aim to build loyal relationships with our suppliers, based on the principles of integrity and the rules of fair competition. We guarantee to maintain their confidentiality and to ensure a balanced relationship in terms of contract negotiations.

We cherish long-term relationships and help our partners to improve their CSR performance on an ongoing basis.

→ We implement a risk management programme to ensure respect for people and the environment throughout our supply chain.



### Further reading

- Statement of Non-Financial Performance
- Verallia Group Supplier Charter
- Responsible purchasing policy



### Contacts

- Purchasing Department
- CSR and Legal Department
- Compliance officers

→ When in doubt

### Practices to implement

- ✓ Ensure that our partners uphold our values and the ethical principles set out in this Code.
- ✓ Report any partner likely to breach our ethics.
- ✓ Select our suppliers based on objective and impartial criteria.
- ✓ Respect our suppliers' intellectual property rights.

### Practices to avoid

- ✗ Imposing abusive conditions on our business partners.
- ✗ Disclosing our partners' confidential information.

### Case studies

When visiting one of our supplier sand extractor supplier's quarry, I realise that their workers are not wearing any protective equipment while they work. What should I do?

We require our suppliers to comply with safety standards. You must immediately report the situation to the Purchasing Department.

A friend working for one of our suppliers told me that they discharge their waste into a nearby river. How should I react?

We ask our suppliers to uphold our values, which include environmentally friendly practices. Notify the Purchasing Department or the CSR and Legal Department.



# Protecting Verallia's assets

**We must protect our tangible and intangible assets to be effective.**

The Group's assets go beyond physical property, machines, inventory, company cars, furniture and IT facilities. They also include intangible assets, software, patents, brands, copyright, expertise, reputation, and more.

Our assets enable us to achieve our goals. We must use them responsibly and for the intended professional purposes only.

We are all responsible for protecting Verallia's assets.

We must use and maintain our tangible assets with care and respect to avoid any waste, misuse, damage, theft or misappropriation thereof.

We must also protect our intellectual property, IT systems, reputation, confidential information, etc.



**We must use the Group's assets responsibly and with respect.**

## Contacts

- CSR and Legal Department
- IT Systems Department

**→ When in doubt**

## Practices to implement

- ✓ Use the company's assets with care and respect.
- ✓ Report any weaknesses in site security and storage areas.
- ✓ Follow safety programmes to combat the misuse or theft of our assets.
- ✓ Prevent any unauthorised access to our IT systems by securing our access codes.
- ✓ Be vigilant about our intellectual property rights.

## Practices to avoid

- ✗ Allowing unauthorised people to access our IT tools.
- ✗ Selling or transferring company assets without approval from Management.
- ✗ Using the company's equipment for personal reasons.

## Case studies

Someone has reached out to discuss an innovative project involving a carbon-free furnace. We have actually started working on a virtually identical project, and filed patents in that regard. What should I do?

Contact the CSR and Legal Department, as there may be a risk of intellectual property theft. Do not disclose any information on Verallia's project to this person.

I receive a suspicious email from a colleague's work address. How should I react?

Contact your IT department and send it to the Phishing team. Your colleague may have been hacked, compromising their access to our IT services.



# Respecting confidentiality

**We must protect the confidentiality of Verallia's strategic information and expertise.**

Information is considered confidential if:

- it is non-public;
- it concerns Verallia;
- it is known to a limited number of employees;
- its disclosure could be harmful to us.

This information could be results, prices, a customer file, information subject to a non-disclosure agreement, business secrets, technical R&D data, wages, etc.

Within the Group and in the performance of our contracts, we strive to protect confidential data and expertise, as well as the intellectual and industrial property rights and business secrets related to our activities.

If an employee were to disclose confidential information, they would be held civilly and criminally liable.

→ **We protect confidential information from being disclosed or misused.**



## Further reading

- Procedure to protect expertise and confidential information



## Contact

- CSR and Legal Department

→ **When in doubt**

## Practices to implement

- ✓ Keep confidential information safe.
- ✓ Secure our IT communications (privacy filter, encrypted attachments, etc.).
- ✓ Check with the CSR and Legal Department whether a non-disclosure agreement needs to be signed.
- ✓ Before disclosing any information to a person outside of our Group, check that we have the right to do so.

## Practices to avoid

- ✗ Leaving an important document within reach.
- ✗ Disclosing confidential information to someone that does not have a legitimate need to know it.

## Case studies

**I often travel for my job, meaning I need to work in public places like cafés and stations. How can I protect confidential information in those situations?**

Activate your computer's privacy filter and position yourself in a way that covers your screen.

**A friend works for an association that combats plastic packaging. He has asked me for a list of customer contacts to tell them about his association. May I provide him with such a list?**

No, our customer contact list is confidential, personal information that may not be disclosed to third parties.



# Protecting personal data

**We respect the fundamental right to privacy and to personal data protection.**

Personal data means information regarding a natural person, which can be used to identify such person directly or indirectly.

Some personal data is considered sensitive if it reveals information that could lead to discrimination (genetic data, sexual identification and orientation, ethnic origin, etc.).

At Verallia, we recognise the right to privacy and to personal data protection as fundamental rights.

As such, we undertake to limit personal data collection, to process personal data in accordance with regulatory requirements, and to protect them.

We pay particular attention to the processing of sensitive data.

**→ We undertake to protect the personal data we process.**



### Further reading

- Data breach notification policy
- The GDPR in 10 key obligations for Verallia



### Contacts

- CSR and Legal Department
- Compliance officers

**→ When in doubt**

### Practices to implement

- ✓ Have legal grounds to process personal and/or sensitive data.
- ✓ Process only personal data that are adequate, relevant and necessary to meet our requirements.
- ✓ Ensure the safety and confidentiality of personal data collected by Verallia and its partners.
- ✓ Be transparent about the way we process data while protecting the rights of the individuals concerned.
- ✓ Document the processing of personal data.

### Practices to avoid

- ✗ Keeping personal data that is not or no longer necessary.
- ✗ Transferring personal data outside of Europe without first checking with the CSR and Legal Department.

### Case studies

**A partner suggests that we pool the files containing our respective customers' email addresses. May I accept?**

Absolutely not. Email addresses are personal information. They may not be shared with third parties without the consent of the people in question.

**I work in the HR Department, and a production plant manager asks me for access to our employee files to celebrate their birthdays. May I accept his request?**

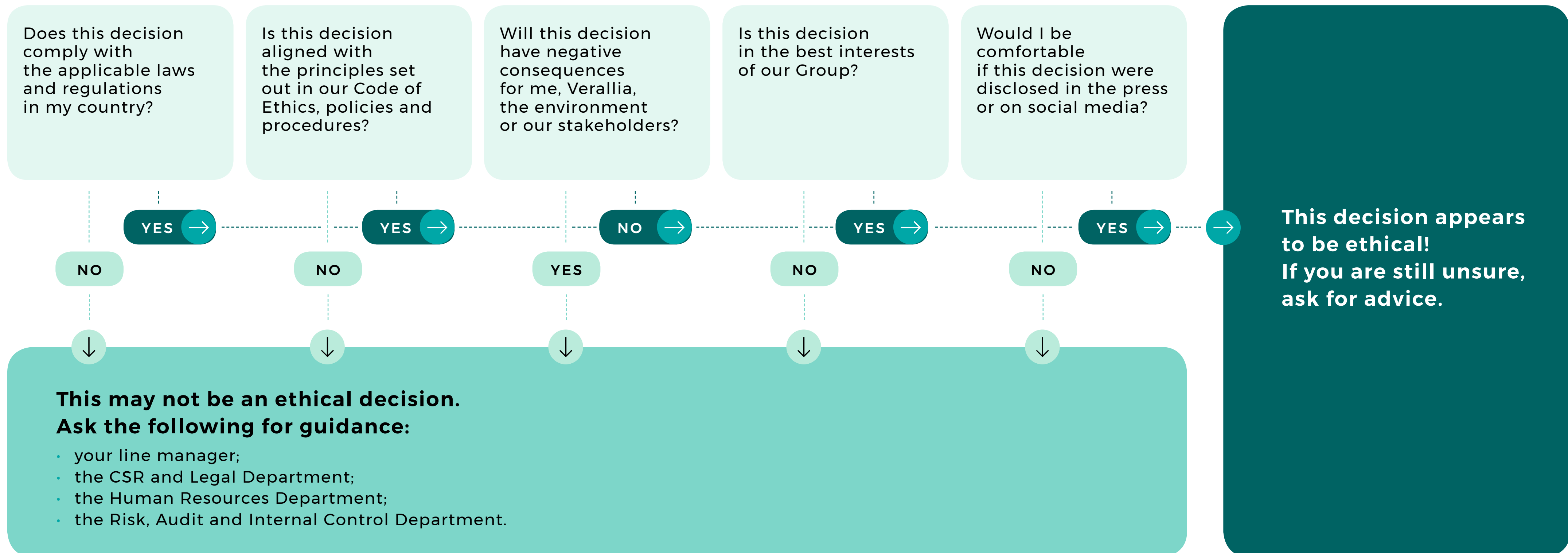
You may share the day and month of birth for those employees working in the production plant, but don't allow them to access all the employee files, which contain personal (and sometimes sensitive) information.

# How to use this Code of Ethics



# Ask yourself the right questions

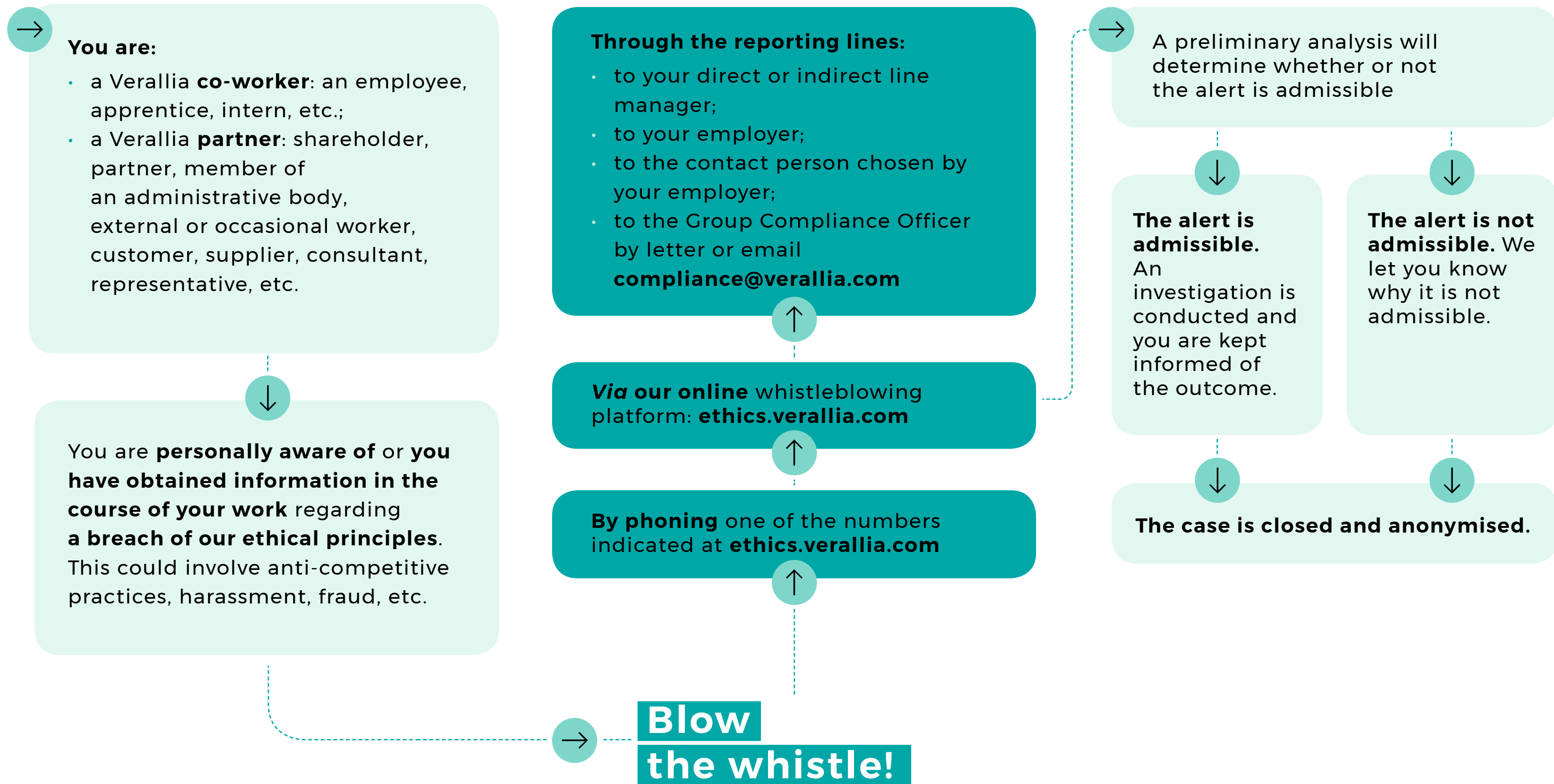
We can't address all high-risk situations in this Code. If you are unsure whether or not a decision is ethical, ask yourself the following:





# Whistleblowing

We rely on each of you to report any breaches of our ethical principles.



## As a whistleblower, you are protected!

Verallia will not tolerate any retaliation if the whistleblowing is done in good faith.

The whistleblower may wish to remain anonymous. However, we encourage you not to choose that option, as the whistleblowing process will be less effective. Regardless of your choice, your identity and that of the people implicated are strictly confidential.

All the data collected in the course of the whistleblowing process is protected. You may access and correct the data, or object to their processing.





# Violations of the Code and sanctions

You must consider this Code as a reference or a minimum requirement that you should always follow, unless this leads you to violate a local law. If such a situation should occur, please contact your line manager or the CSR and Legal Department.

Should you fail to comply with the principles set out in this Code of Ethics, you may be held personally responsible and face disciplinary sanctions.



## Further reading

- Professional Whistleblowing Policy
- Guide on using the professional whistleblowing policy



# Glossary

## → Group asset

### All the company's property and rights:

- tangible: machines, inventory, company cars, furniture, supplies, IT equipment, etc.
- intangible: software, patents, brands, copyright, expertise, reputation, etc.

## → Cullet

Glass derived from selective collection. Added to the other raw materials (sand, sodium carbonate, calcium carbonate), it reduces CO2 emissions by reducing the energy required to melt the glass and by reducing the use of raw materials that emit CO2 when melted. Cullet also helps protect natural resources by reducing their consumption.

## → Conflict of interest

Situation where our personal interests are or may enter into conflict with the interest of our company. Our personal interests also encompass those of our loved ones, family and friends.

## → Corruption

Also known as bribery, it is the act of offering or accepting an undue advantage, such as money, a gift, an invitation, a favour, etc. (money, gift, invitation, service) in exchange for a favourable decision or act.

We can distinguish between **active corruption**, which is committed by the person requesting or offering an advantage, and **passive corruption**, committed by the person accepting the offer or request.

## → Insider trading

Trading in a public company's stock on the basis of inside information, for our personal benefit or that of our family and friends.

## → Personal and sensitive data

Any information relating to a person and that can be used to directly or indirectly identify that person. This can be a first and last name, a telephone number, a postal or email address, etc.

Sensitive personal data reveals a person's race or ethnicity, political opinions, religious or philosophical convictions, membership of a trade union, genetic, biometric or health data, and information on their sexual life and orientation.

## → Circular economy

System that promotes the sustainable production of goods and services via the reuse, recycling and life extension of products and their components to limit the use of resources.

## → Confidential information

Non-public information that would be harmful to Verallia if it were disclosed.

For example, the company's activity and financial or commercial position, information subject to a non-disclosure agreement or a business secret, technical data, designs, and HR data.

## → Inside information

Confidential information regarding the company that could influence the Group's stock price if made public.

## → Facilitating payment

Offering an undue advantage to a public official to accelerate or facilitate an administrative procedure.

## → Influence peddling

Requesting or receiving an undue advantage in exchange for the use of one's real or supposed influence over a third party in order to guarantee a favourable decision.

Société anonyme (Public Limited Company) with capital of €413,337,438.54 - Nanterre Trade and Companies Register 812 163 913

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